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11 Attorneys for Defendants
12 TEXAS TURKEYS, INC. dba
13 ARMADILLO WILLY'S BBQ;
JOHN M. FILICE; and CRAIG P. FILICE

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15 IN THE UNITED STATES DISTRICT COURT
16 IN AND FOR THE NORTHERN DISTRICT OF CALIFORNIA

17 VICTOR EVERLOVE,

CASE NO. C09-05361 LHK
Civil Rights

18 Plaintiff,

19 v.

20 **STIPULATION AND [PROPOSED]
21 ORDER TO EXTEND DEADLINE
22 TO COMPLETE CONSENT
23 DECREE SITE INSPECTION**

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25 TEXAS TURKEYS, INC. dba
26 ARMADILLO WILLY'S BBQ; JOHN
27 M. FILICE, JR.; CRAIG P. FILICE;
AND DOES 1-10, INCLUSIVE,

/

28 Plaintiff VICTOR EVERLOVE and defendants TEXAS TURKEYS, INC. dba
ARMADILLO WILLY'S BBQ; JOHN M. FILICE, JR.; CRAIG P. FILICE by and
through their attorneys of record, hereby jointly stipulate to the continuance of the
September 7, 2011, deadline to complete the site inspection ordered by the Court under

1 the terms of the Consent Decree and Order of April 15, 2011.

2 Good cause exists for requesting this continuance. A site inspection had
3 previously been set by mutual agreement of the parties for August 31, 2011. Due to a
4 scheduling error by plaintiff's expert, the site inspection was not able to move forward
5 on that date.

6 The parties have now cooperatively rescheduled the site inspection for October
7 11, 2011. This was the first mutually agreeable date available for all parties. The
8 parties therefore jointly stipulate and request the Court order an extension of the deadline
9 to October 11, 2011, to complete the site inspection, and within 30 days thereafter will
10 file a joint status report regarding the outcome of the inspection.

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12 Dated: September 7, 2011

LAW OFFICES OF PAUL L. REIN

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14 /s/ Celia McGuinness
15 By: CELIA McGUINNESS
16 Attorneys for Plaintiff
17 VICTOR EVERLOVE

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19 Dated: September 7, 2011

LAW OFFICES OF SARRAIL, CASTILLO &
20 HALL LLP

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22 Ivanka Ackbari
23 By JAMES A. SARRAIL
24 IVANKA F. ACKBARI
25 Attorneys for Defendants
26 TEXAS TURKEYS, INC. dba
27 ARMADILLO WILLY'S BBQ;
28 JOHN M. FILICE; and CRAIG P. FILICE

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2 **[PROPOSED] ORDER**
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4 Pursuant to stipulation of the parties and for GOOD CAUSE SHOWN, it is
5 hereby ORDERED that the deadline to complete the site inspection by September 7,
6 2011, previously ordered by the Court is extended to October 11, 2011. The parties are
7 ORDERED to file a joint status report within 30 days thereafter regarding the outcome
of the inspection.

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9 Dated: September 13, 2011
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Lucy H. Koh
11 HON. ~~LU~~CY H. KOH
12 U.S. DISTRICT JUDGE
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